



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

MARY FALLIN
Governor

May 11, 2015

USEPA Region 6
Attn: Mr. Steve Thompson
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Subject: Request for a Regulatory Applicability Determination
ONEOK Field Services Company, L.L.C.
Antioch Booster Station (DEQ Facility ID: 1498)
Permit No. 2011-144-C (M-1)
40 CFR Part 63 Subpart ZZZZ Major/Area Source Applicability Issues

Dear Mr. Thompson:

The Oklahoma Department of Environmental Quality (ODEQ), Air Quality Division (AQD), is requesting an applicability review of 40 CFR Part 63, Subpart ZZZZ for the Antioch Booster Station, which is owned and operated by the ONEOK Field Services Company, L.L.C. (OFS). More specifically, we are asking whether, at the conclusion of the construction activities authorized by the above-referenced permit, the engines that will be installed at the site will be subject to the *major* or *area* source requirements of NESHAP, Subpart ZZZZ. This request is being submitted concurrently with our submission of the draft/proposed version of Permit No. 2011-144-C (M-1) for your review. ODEQ is also requesting general guidance on the applicability of area source standards to facilities that are major sources based on the Once-In-Always-In policy, but which subsequently become area sources. Put another way, under EPA's Once-In-Always-In policy, may a major source of HAP become an area source if all existing, major source engines are retired and, subsequently, new, area source engines are started up?

Background

OFS has submitted an application for a construction permit for the Antioch Booster Station. The facility is currently operating under a Title V operating permit (Permit No. 2011-144-TPV2). The facility is a natural gas booster station (SIC 1311, NAICS 211111). In its current configuration, the facility is a major source of one HAP, formaldehyde (12.54 TPY), and one criteria pollutant, NO_x (674.82 TPY). The following emission units are currently installed at the facility: nine 600-hp Cooper Bessemer GMV-6 engines, a 300-bbl scrubber oil storage tank, a 302-bbl condensate storage tank, a 500-gallon methanol storage tank. The facility also



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experiences emissions associated with fugitive sources (piping, valves, etc.), loading losses, and blowdowns.

Under the construction permit referenced above, OFS will first remove all of the existing engines from service as well as two of the storage tanks. At that time, none of the units currently subject to NESHAP, Subpart ZZZZ and the Once-In-Always-In policy will exist (as permitted emission units) at the Facility. OFS will also install five new 1,775-hp Caterpillar G3606LE TA engines, six new 300-bbl condensate storage tanks, two new flares, two new 300-bbl produced water tanks, and one new 210-bbl methanol tank. On completion of this project, the facility will no longer be a major source of formaldehyde, NO_x, or CO, but it will be a major source of VOCs (154.42 TPY). The facility will be a minor source of all other pollutants.

Please refer to the permit memorandum for a more detailed discussion of the facility's permitting history and an analysis of the proposed changes to the site.

Regulatory Policy Interpretation and Request for Guidance

OFS presented us with the argument that, following the removal from service of the existing engines, and after startup of the new engines, the facility will be an area source of HAPs and the new engines would only be subject to the requirement (from NESHAP, Subpart ZZZZ) to comply with all applicable requirements of NSPS, Subpart JJJJ. We believe that there may be ambiguity regarding this issue and, therefore, we are requesting clarification from you.

We would like to highlight the following points.


- The facility is currently a major source of HAPs.
- The engines currently located at the facility, while considered a Once-In-Always-In major source under NESHAP, Subpart ZZZZ, are not actually subject to any requirements under NESHAP, Subpart ZZZZ.
- All engines currently installed at the site will be permanently taken out of service prior to the start-up of any new engine.

ODEQ requests that EPA clarify whether the removal of the above-mentioned engines will result in the booster station becoming an area source of HAPs, thereby rendering moot the implications of the Once-In-Always-In policy with regard to this site and subjecting the new engines only to the area source requirements of NESHAP, Subpart ZZZZ.

Please let us know whether or not you agree with the above-stated analysis.

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Should you have any questions regarding this request please contact Tom Richardson at **PBI / Ex. 4** or by e-mail (tom.richardson@deq.ok.gov).

Sincerely, 

PBI / Ex. 4

Dawson Lassefer, Chief Engineer
Air Quality Division
Oklahoma Department of Environmental Quality

cc: USEPA Region VI
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